

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BARLETTA HEAVY DIVISION, INC.,)	
)	
Plaintiff)	
)	
v.)	
)	Civil Action No.09-10143-NMG
ERIE INTERSTATE CONTRACTORS,)	
INC.;)	
PHOENIX DEVELOPMENT AND)	
CONSTRUCTION, INC.;)	
ERIE PAINTING & MAINTENANCE,)	
INC.;)	
GREGORY ZAFIRAKIS,)	
STEVE ZAFIRAKIS and)	
STEVEN MOUTSASTOS,)	
)	
Defendants)	
)	

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

Now come the Plaintiff Barletta Heavy Division, Inc., the Defendants Erie Interstate Contractors, Inc., Phoenix Development & Construction, Inc., Gregory Zafirakis, Steve Zafirakis and Steven Moutsastos and the Defendant Erie Painting & Maintenance, Inc. and respectfully submit this *Joint Motion to Extend the Discovery Deadline*.

The parties have propounded written discovery to each other, and pursuant to this Court's scheduling order, responses to the written discovery requests are due by June 30, 2009. The parties respectfully request that the deadline for their responses to

the written discovery requests be extended by one month, or until July 31, 2009. None of the other deadlines in this case will be affected by this short extension.

This is the first request for an extension that the parties have requested.

Wherefore, the parties respectfully request that the deadline for them to respond to each other's written discovery requests be extended until July 31, 2009.

Respectfully submitted,
DEFENDANTS ERIE INTERSTATE
CONTRACTORS, INC.; PHOENIX
DEVELOPMENT AND
CONSTRUCTION, INC.;
GREGORY ZAFIRAKIS,
STEVE ZAFIRAKIS and
STEVEN MOUTSASTOS,
By their attorneys,

/s/ David P. Russman

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PLAINTIFF BARLETTA HEAVY
DIVISION, INC.

By its attorneys,

/s/ Laurence K. Richmond

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DEFENDANT
ERIE PAINTING AND
MAINTENANCE, INC.
By its attorneys,

/s/ Katherine Flaws

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